REMARKS

Applicants respectfully request reconsideration of the present application in view of the foregoing amendments and in view of the reasons which follow.

New independent claims 1-3 are directed to steels which comprise from 0.20% (exclusive) to 0.30% by weight of C. Support for this amendment can be found in the C content of steels P15, P18 and P20 in Table 1 in the specification. Thus, new independent claims 1, 2 and 3 respectively correspond to original claims 1, 3 and 4 except for the minimum C content.

New independent claims 4-6 are directed to steels which comprise from 0.3% to 0.8% by weight of Mo. These new independent claims 4, 5 and 6 respectively correspond to original claims 2, 3 and 4. Support for new claims 35-37 can be found in example P14. No new matter has been entered.

Five references, EP1081244, EP0787813, JP8-325669, JP8-246096 and JP2-217439, have been cited during the prosecution of the corresponding U.K. application and are cited in an IDS being submitted concurrently herewith.

Regarding the four cited references except JP8-246096, these references fail to teach or suggest a heat-resisting steel without aluminum (Al) as defined in claims 1-10. The same arguments as in the previous response regarding the exclusion of aluminum based on the Rule 132 Declaration apply to these four references.

Regarding JP8-246096, the steels of this reference do not explicitly include Al. However, this reference also fails to teach or suggest the deterioration caused by the incorporation of Al as in the previous response. In addition, the content of at least one of Mo and C in the steels of JP8-246096 is different from those of the present invention. While the steels of the present invention recited in claims 1-3 comprise from 0.20% (exclusive), i.e., more than 0.20% of C, to 0.30% by weight of C, this range is clearly different from the C content of JP8-246096 (from 0.02% to 0.2% by weight). In the present steels recited in claims 1-3, the higher range of the C content improves the property that C ensures high hardenability and works as an important constituent element of carbides that will participate in precipitation hardening (see page 3, lines 11-

21 of the specification). JP '096 fails to teach or suggest this improvement from increased amounts of C.

The steels of the present invention recited in claims 4-6 comprise from 0.3% to 0.8% by weight of Mo. This content is significantly different from the composition of JP8-246096 which does not include any Mo. In the present steels recited in claims 4-6, Mo works as an element that participates in solid-dissolution hardening, and also as a constituent element of carbides (see page 5, lines 1-9 of the specification). JP '096 fails to teach or suggest this improvement from the inclusion of Mo in the claimed amounts.

Accordingly, the claims are believed to be allowable over the prior art of record including JP8-246096, EP1081244, EP0787813, JP8-325669, and JP2-217439.

The Examiner is invited to contact the undersigned by telephone if it is felt that a telephone interview would advance the prosecution of the present application.

Respectfully submitted,

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